U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region II

Subject: POLREP #22

RV1

Tonawanda Coke Corporation

0201601

Tonawanda, NY

Peter Lopez, EPA, Region 2 To:

Christopher Lyon, EPA ORA Region 2 Walter Mugdan, EPA ORA, Region 2 Angela Carpenter, EPA ERRD, Region 2 John Prince, EPA ERRD, Region 2 Eric Wilson, EPA ERRD, Region 2 Joe Rotola, EPA RAB, Region 2 Eric Mosher, EPA RPB, Region 2 Leonard Voo, EPA DECA, Region 2 Dore LaPosta, EPA DECA, Region 2 Dan Harkay, EPA RAB, Region 2 Shawna Hoppe, EPA RPB, Region 2 Mark Pane, EPA RAB, Region 2 Thomas Budroe, EPA RAB, Region 2 Peter Lisichenko, EPA, RAB Region 2 Dwayne Harrington, EPA RPB, Region 2 Harish Patel, EPA DECA, Region 2 Douglas McKenna, EPA DECA, Region 2 James Doyle, EPA ORC, Region 2 Margo Ludmer, EPA ORC Region 2 Mary Mears, EPA PAD, Region 2 Michael Basile, EPA PAD, Region 2

James Quinn, NYSDEC Christopher LaLone, NYSDEC

Kevin Hale, NYSDEC Bonnie Hriczko, EPA RAB, Region 2

Tim Benton, Weston Solutions

From: Peter Lisichenko, OSC

Date: 11/12/2018

Reporting Period: 11/09/18 to 11/12/18

1. Introduction

1.1 Background

Site Number: A28U **Contract Number:** D.O. Number: Action Memo Date:

Response Authority: CERCLA Response Type: Emergency Response Lead: FPA Incident Category: Removal Action

NPL Status: Non NPL Operable Unit:

Mobilization Date: 10/17/2018 Start Date: 10/17/2018

Demob Date: Completion Date:

CERCLIS ID: RCRIS ID: NYD088413877

ERNS No.: State Notification: Yes FPN#: Reimbursable Account #:

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without

secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

All boiler and process operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are continuing.

ERRS contractor continued to excavate contaminated soil in the processing area. Starting at the location know as the Steel Sump, the work is extending east towards the Byproducts Processing area. The depth of excavation is from the surface down to 6-inches below grade and is intended to mitigate the migration of contaminants to the stormwater system. Sludge like material is being bulked in 55-gallon drums while the stained soils is being staged in lined containment areas. To date, approximately 61-cubic yards has been excavated. Disposal characterization samples had been collected by the RST contractor and submitted for analysis. Excavated areas are being backfilled with 2-inch crusher-run gravel (with fines).

The ammonia solution transfer from the south storage tank (ST23) to the weak ammonia liquor tank (PT02) continues. The transfer operations is being performed every other day to allow processing time for the distillation process. For this operational period, approximately 46,370 gallons of ammonia solution were transferred from the south to the north tank for treatment. In total, approximately 125,330 gallons of ammonia solution has been processed.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest#	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

- 1. Continuing operating the boiler and supporting systems.
- Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
- Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
- Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
- 5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
- Continue to maintain and monitor both the plant process water and the surface storm water systems
- Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
- 8. Clean and subsequently remove the plant process containment areas.
- 9. Winterize the vessels and pipes on the Site to protect from freezing.
- 10. Evaluate methodology for sealing the sumps at the site.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

EPA is funding the removal action. The costs below include pending costs.

Estimated Costs *		
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11	Total To	%

	Budgeted	Date	Remaining	Remaining				
Extramural Costs								
ERRS - Cleanup Contractor	\$550,000.00	\$430,895.97	\$119,104.03	21.66%				
TAT/START	\$50,000.00	\$0.00	\$50,000.00	100.00%				
Intramural Costs								
Total Site Costs	\$600,000.00	\$430,895.97	\$169,104.03	28.18%				

^{*} The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC, 15 ERRS personnel and 2 RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.